# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SUZANNE GENEF	REUX, et al.,	)	
	Plaintiffs,	)	Civil Action No.
V.		)	04-CV-12137 - JLT
		)	
AMERICAN BERY	LLIA CORP., et al.	)	
		)	
	Defendants.	)	

### PLAINTIFFS' ASSENTED TO MOTION TO ENLARGE OPPOSITION PERIOD

Plaintiffs hereby file this assented-to motion to extend the time for filing their oppositions to both filed and anticipated motions for summary judgment from the usual fourteen (14) days to a total of thirty (30) days each.

As grounds for this motion, plaintiffs state that the summary judgment motion filed by defendant Brush Wellman raises several complex issues of fact and law which call for a reasonable additional period of time for a thorough and fully researched response. Consequently, plaintiffs have requested, and defendant Brush Wellman has assented to, an extension up to and including November 22, 2006 for the filing of plaintiffs' Opposition.

In addition, although it has not yet filed such a motion, defendant American Beryllia Corp. has indicated its intention to file a summary judgment motion during the pendency of defendant Brush Wellman's motion. Consequently, plaintiffs have requested, and defendant American Beryllia Corp. has assented to, an extension of a total of thirty (30) days from the date of filing American Beryllia's motion for the filing of plaintiffs' Opposition.

WHEREFORE, plaintiffs' respectfully request the Court's approval of such reasonable additional time for the filing of plaintiffs' Oppositions and requests the allowance of their assented-to motion.

Respectfully Submitted,

## MEEHAN, BOYLE, BLACK & FITZGERALD, P.C.

/s/ Bradley M. Henry

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OF COUNSEL (admitted pro hac vice):

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The Defendant, Assented To Brush Wellman By Their Attorneys,	The Defendant, Assented To American Beryllia Corp. By Their Attorneys,	
/s/ Alan Spiro	/s/ William F. Ahern	
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#### **CERTIFICATE OF SERVICE**

I, Bradley M. Henry, certify that on October 30, 2006, I served the foregoing Plaintiffs' Assented To Motion To Enlarge Opposition Period, by electronic filing and mailing an exact copy postage prepaid to all counsel of record.

/s/ Bradley M. Henry
\_\_\_\_\_Bradley M. Henry